

## Response to Comments

### Camrosa Water District Camrosa Water Reclamation Facility Tentative WRR/WDR

This Table describes all significant comments received from interested persons with regard to the above-mentioned tentative permit. Each comment has a corresponding response and action taken.

Commenter	#	Comment	Response	Action Taken
<b>Comments received from the Camrosa Water District on January 20, 2015</b>				
Camrosa Water District	1	Page 5, Section III.3.C Please change the statement to read, "A significant amount of chloride loading <b>does</b> occur from the use of water softeners." Internal studies have shown that 1/3 of our chloride loading is attributed to home regenerative water softeners.	Staff agreed to the proposed changes.	Revisions were made to the permit
Camrosa Water District	2	Page 9, Section 9, 2 <sup>nd</sup> paragraph This paragraph states that the application of our recycled water at agronomic rates is not expected to measurably impact water quality. Furthermore, THM's are well known to be volatile compounds. Analysis of our University Well, which lies within the recycled water irrigation area for over 20 years, contains no THM's . Proof of this has been submitted to this regional board during this renewal process.	Staff agrees that the 2011 data submitted from the University Well indicates that the groundwater did not contain detectable levels of total trihalomethanes (TTHMs); however there is insufficient evidence to suggest that the TTHMs produced at the Camrosa WRF are not impacting groundwater quality. The concentrations of TTHMs produced at the Camrosa WRF are consistently above the safe drinking water Maximum Contaminant Level (MCL) of 80 µg/L. In order to protect the groundwater quality from degradation, these WDRs/WRRs include a final effluent limitation for TTHMs, and an interim final effluent limitation for TTHMs along with a compliance schedule. The compliance schedule was requested by the CWD in order to receive interim effluent limits while the CWD performs an investigation on the source and possible mitigation	None required.

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			measures that may reduce the concentration of TTHMs in the effluent.	
Camrosa Water District	3	Table M1, Page MRP-4 Camrosa Requests that the frequency of Total Coliform analysis match the frequency of analysis stipulated in the plant's NPDES Permit. The frequency appearing in the NPDES Permit Attachment E-7 subscript #5 indicates that daily samples for this constituent are collected Monday – Friday Except holidays.	Staff agreed to the proposed changes.	Revisions were made to the permit.
Camrosa Water District	4	MRP Section IV, Page MRP-5 Camrosa completed a two year groundwater monitoring program of the kind described here in 1997. The purpose was to determine if CWRf effluent was degrading the groundwater lying beneath our storage ponds. It is well established that the TDS of the groundwater is 1800 mg/L in the area beneath the ponds. Furthermore, monitoring from the last 5 years indicates that effluent TDS is between 662-992 mg/L. The prior study concluded that our plant's effluent improved the underlying groundwater quality. Since that time, both groundwater as well as plant effluent have remained the same quality. Camrosa feels that this new study is unnecessary as none of the conditions have changed. We respectfully request that this monitoring program be deleted.	<p>Staff has determined that groundwater monitoring is necessary to ensure that the underlying groundwater basin is protected from degradation. Analysis of the groundwater up-gradient and down-gradient of the recycled water storage ponds will establish a baseline for the constituents that were not analyzed in 1997 and it will also provide data that may be used to determine if any groundwater quality trends exist.</p> <p>Staff agrees that the 1997 Baseline Study suggests that the groundwater quality is being enhanced by the recycled water from the Camrosa WRF; however, the current quality of the groundwater up-gradient and down-gradient of the recycled water storage ponds has not been determined. The current quality of the groundwater is necessary to determine if the groundwater quality has changed significantly since the 1997 study and to determine the concentrations of constituents in the groundwater that were not analyzed in the 1997 study and may pose a potential threat to the groundwater quality.</p> <p>Although the groundwater monitoring cannot be eliminated completely, the Tentative WDRs/WRRs</p>	Revisions were made to the permit.

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			<p>contain language that permit a revision of the groundwater monitoring. Footnote 16 on Table M2 states, "After two years the Permittee may propose a reduced groundwater monitoring schedule based on data collected during that period. The rationale used to determine the request for a reduced program must be stated, and is subject to the Regional Water Board's approval." This statement does not indicate that the groundwater monitoring may be eliminated completely after 2 years with the appropriate rationale, only that the monitoring may be modified. To clarify, the footnote has been modified to read, "After two years the Permittee may propose a reduced groundwater monitoring schedule, <u>or elimination of the groundwater monitoring program completely</u>, based on data collected during that period. The rationale used to determine the request for a <u>reduced-modified groundwater monitoring</u> program must be stated, and is subject to the Regional Water Board's approval."</p> <p>In addition, staff has agreed to reduce the quarterly groundwater monitoring required in the tentative WRRs/WDRs to a semiannual requirement.</p>	
Camrosa Water District	5	<p>Page 13, table 6</p> <p>The Total Coliform requirements listed in the table only list a 7 – day average requirement of 2.2. On page 20, Section XII, #1, the narrative limits describe additional requirements of 23 MPN in a 30 day period and 240 MPN in any sample. Camrosa requests that table be made to reflect the aforementioned narrative limits.</p>	Staff agreed to the proposed changes.	Revisions were made to the permit

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Camrosa Water District	6	<p>Page 5, Section III.3</p> <p>Camrosa would like to have the following language added to our permit to recognize the effect that utilizing local groundwater resources has on measured salts in our wastewater treatment plant effluent. “Due to the drought and reduced supplies of import water, California Water agencies have been encouraged to develop and utilize more local resources. Local groundwater typically contains a higher salt content than import water. This would pass through conventional wastewater treatment and appear in the processed wastewater discharge. It should be noted, however, that the use of local groundwater, while increasing measured concentrations of salts in wastewater treatment plant effluent, removes salts from the watershed at the same time resulting in a net zero gain in total salts watershed wide. Local groundwater use displaces the need for imported water and thus, prevents importation of additional salts on to the watershed. “</p>	<p>Staff agreed to the following revised language:</p> <p>“Due to the drought and reduced supplies of import water, California water agencies have been encouraged to develop and utilize more local resources. Local groundwater typically contains a higher salt content than import water and passes through conventional wastewater treatment. Although the use of local groundwater increases the concentrations of salts in the final effluent, the watershed as a whole experiences no net gain in salts as a result of this process. Local groundwater use displaces the need for imported water and thus, reduces importation of additional salts into the watershed.”</p>	Revisions were made to the permit